

Confederated Tribes of the Colville Reservation Office of Environmental Trust Air Quality

P.O. Box 150 · Nespelem, WA · 99155 · Ph: 509-634-2418 · Fx: 509-634-2422

Information Sheet Brownfields Assessment Grant Proposal, FY2019

1. Applicant Identification:

Confederated Tribes of the Colville Reservation (CTCR)

13 Methow Street P.O. Box 150

Nespelem, WA 99155

2. Funding Requested:

a. Assessment Grant Type: Community-wide

b. Federal Funds Requested

i. Requested Amount: \$300,000

ii. Site-Specific Assessment Grant Waiver: Not applicable

c. Contamination: \$152,459 Hazardous Substances and

\$143,785 Petroleum

3. Location:

Colville Indian Reservation, Okanogan and Ferry Counties, Washington. Cities/towns that constitute our Target Areas are

Omak, Inchelium, Elmer City, and Nespelem.

4. <u>Property Information for</u>

Site-Specific Proposals:

Not Applicable

5. Contacts:

a. Project Director

Name:

Amelia Stanger

Title:

Tribal Response Program Manager, Environmental Trust Dept.

Phone Number:

509-634-2585

Email Address:

Amelia. Stanger. ENV@colvilletribes.com

Mailing Address:

P.O. Box 150, Nespelem, WA, 99155

b. Highest Ranking Elected Official

Who:

Francis Somday

Title:

Executive Director

Phone Number:

509-634-2238

Email Address: Mailing Address: francis.somday@colvilletribes.com P.O. Box 150, Nespelem, WA, 99155

6. Population:

Colville Indian Reservation (population 7,686 including 4,616 tribal members and 3,070 non-tribal members)

The following cities/towns are our Target Areas:

- Omak (approximately 1,615 on the Reservation),
- Inchelium (409),
- Elmer City (247), and
- Nespelem (236)

7. Other Factors Checklist:

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Community population is 10,000 or less.	1, 4
The applicant is, or will assist, a federally recognized Indian tribe or	1, and throughout
United States territory.	(applicant is a tribe)
The priority brownfield site(s) is impacted by mine-scarred land.	Not Applicable
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1, 2, 3
The priority site(s) is in a federally designated flood plain.	Not Applicable (Hinman Ranch priority site has active floodplain, and is undergoing current mapping)
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	3

8. Letter from State Environmental Authority

As the applicant, we (the CTCR) are the Tribal Environmental Authority. We acknowledge that we (the CTCR) plan to conduct assessment activities and are applying for FY19 federal brownfields grant funds.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area

This proposal from the Confederated Tribes of the Colville Reservation (CTCR) requests \$300,000 to assess former timber industry facilities, blighted housing, and a streamside property. Our Reservation is home to twelve tribes, and is roughly 1.4 million acres of mountains and steppe bound on three sides by the Columbia River and the Okanogan River in north-central Washington. Four of our tribes have historical fishing and gathering grounds on the Reservation, seven were relocated from river valleys of northern Washington and the hilly grasslands of southeastern Washington, and one (the Nez Perce tribe originally led by the iconic Chief Joseph) is from the Wallowa Valley of northeastern Oregon.

Our history is one of struggle for survival and self-determination in the face of lost territory, salmon fishery degradation, and the economic boom and bust of the wood products industry. After the Reservation was established in 1872, a Congressional decree 20 years later removed the mineral-rich northern half of the Reservation from tribal control. Additional lands were lost through federal policies that redistributed properties on the Reservation to private individuals. The Grand Coulee Dam was constructed on the southern edge of our Reservation in 1940, submerging Kettle Falls amid a *Ceremony of Tears* by local tribes mourning the loss of prime salmon fishing grounds. Additional Reservation fisheries were destroyed with completion of Chief Joseph Dam in 1958. Federal promises of low residential electricity rates from the dams did not materialize, and over time our economy shifted to near-total reliance on the timber industry. After years of uncertainty, the timber industry has now collapsed, including closure of the Inchelium Wood Treatment Plant in 2005 and the Omak Mill in 2009 for a combined loss of over 600 jobs. With this grant, we plan to assess these facilities.

After timber industry collapse, many of our tribal members struggled to get by. The Reservation population is primarily American Indian. We suffer from median household income under \$39,000, and rates of unemployment and poverty approximately twice those for Washington and the U.S. In the face of current economic hardship and elevated rates of preventable causes of death such as suicide and diabetes, our leaders are pursuing a vision of economic self-determination and community revitalization. Tribally-run enterprises driving this vision include new gas stations, grocery stores, and a lakeside resort. We seek to include brownfields redevelopment in this vision, and transform blighted former wood products facilities into sites for new businesses, housing, and community health facilities.

Our target areas are the four main towns on the Reservation, including Omak to the west, Inchelium to the east, Elmer City near Grand Coulee Dam to the south, and the central community of Nespelem. Each town included as a target area has less than 2,000 people, consists of a few city blocks less than half a mile across, and has out-of-use blighted brownfield facilities.

ii. <u>Description of the Priority Brownfield Site(s)</u>

We have operated a brownfields Tribal Response Program (TRP) for 14 years, but annual funding of the TRP is insufficient to address our larger and more complex brownfield sites, which are the priority sites for this grant listed in the table on Page 2. The priority sites include wood products facilities (Omak Mill, Inchelium Wood Treatment Plant, and Nespelem Post & Pole), a blighted residential property (Grandview Trailer Court), and the chemical handling area of the former Hinman Ranch. The Grandview Trailer Court site is our most urgent site. Many homes burned there in 2018, and some residents remain in structures that still have unsafe wiring. After relocating the residents, we seek to address the potential contaminants of asbestos, lead, and meth on these unsafe structures, remove them, and build new mixed-income housing on this property, which is adjacent to the Columbia River.

The Omak Mill site has the most economic redevelopment potential. The 386-acre facility includes an on-site water supply system, large buildings (75,000 square feet crane shed, 176,000 square feet plywood plant), rail

service, fiber optic vault, and a 20 Megawatt electrical substation. Assessment in the near-term will focus on areas of the mill we expect may be less contaminated. We are proposing to construct community health facilities on the North Log Yard, a Technology Park on 67 acres southwest of the former mill, and to restore adjacent Omak Creek.

Site Name	Past Land Use / Current Site Conditions	Environmental Concerns	Proposed Redevelopment		
Omak Mill*	Plywood Plant (1921-2017)	Fuels, Oils, Railroad	North Log Yard – Health Clinic,		
	including log storage, gluing and	ties, Phenolic resin	Head Start Facility		
	pressing, maintenance, storage	discharge to	Southwestern Area - Technology		
	and dispensing of petroleum	floodplain	Park: Master Plan prefers Data		
	products (gasoline, diesel, oil,	12	Center, Solar Panel Assembly, and		
	and asphalt) / Currently Idle		Wood Pellet Manufacturing		
Inchelium Wood	Wood Treatment Plant (1985-	Metals (arsenic,	Preferred site for Inchelium District		
Treatment Plant	2005) / Current vehicle yard for	chromium, copper,	Tribal government storage building		
	Fish & Wildlife Program	lead), Diesel			
Grandview	Concentrated low-income	Asbestos, Lead,	Remove blight, replace housing;		
Village Trailer	housing / Burned and partially-	Methamphetamine	avoid additional fires from faulty		
Court, Elmer	salvaged buildings alongside	,,	electrical installation		
City*	occupied structures				
Nespelem Post &	Pole treatment (1973-1983) /	Pentachlorophenol	Expand and enhance existing Tribal		
Pole	Capped pole treatment area,	(monitored),	Recycling Center		
	Blighted buildings	Asbestos, Lead			
Hinman Ranch,	Private cattle ranch (1912-2010)	DDT, Wood	Restore on-site stream, plant		
North of	including cattle dip vat, wood	treatment	traditional food sources		
Nespelem*	treatment, landfill, fueling,	chemicals, Fuels,	(bitterroot, sarvis berry), expand		
	maintenance / Open Land	Drums of chemicals	community walking path		

Notes:

In the valley north of Nespelem, we envision restoration of ecological, cultural, and health values at the Hinman Ranch brownfield site. The former ranch had a fueling area, and was used as a landfill and chemical treatment facility for cattle and wood products. Despite contaminants in the developed center of the property, the 228 acres is an ideal location for re-establishing traditional plants such as bitterroot and sarvis berry. As assessment funding allows, we plan to also assess dilapidated housing sites, illegal dump sites, a former landfill proposed for an archery target area, and a former vehicle maintenance area proposed for infill development within the town of Nespelem.

b. Revitalization of the Target Area

i. Redevelopment Strategy and Alignment with Revitalization Plans

At the Omak Mill, there are separate redevelopment strategies for the North Log Yard and Southwestern Technology Park. The 30-acre North Log Yard was designated for community health facilities in a 2018 Tribal Business Council resolution. The property is prime redevelopment land on Omak Creek and Highway 155, adjacent to the East Omak neighborhood. The first phase of proposed development would be a bank-financed Health Clinic. Second phase would be a grant-supported Head Start facility. The third phase would consist of a wellness/recreation center in the middle of the North Log Yard, and playfields near Omak Creek. This is consistent with the 2018 Redevelopment Plan, which acknowledges unstable fill present on the eastern edge of the site near Omak Creek.

A Technology Park is the proposed redevelopment for a 67-acre area southwest of the former plywood mill building. In both the Master Plan Update and the Foreign Trade Zone (FTZ) Plan for the site, the southwestern

^{*} Adjacent to a body of water

area was designated for technology-focused businesses that benefit from low-cost high-capacity electrical service, rail service, and the large industrial buildings. Preferred developments include a data center and a manufacturing plant for renewable energy products, such as recycled wood pellets.

The proposed Inchelium District storage building proposed on the former Inchelium Wood Treatment Plant is a directive of District Representatives on the Tribal Business Council. The former Nespelem Post & Pole facility would be redeveloped into an expanded recycling facility, in accordance with recommendations in our 2014 Waste Management Study that called for centralizing operations near Nespelem, rather than spreading operations to each rural District. Proposed redevelopment for the Grandview Trailer Court site is mixed-income housing, as recommended in our draft 2018 Housing Plan, which calls for development that encourages interaction between people of different backgrounds and incomes, rather than concentration of low-income housing.

ii. Outcomes and Benefits of Redevelopment Strategy

On the North Log Yard area of the Omak Mill, the proposed Tribal Health Clinic will provide better access to medical care in the Omak District, and will capture the economic benefit of local healthcare expenditures. Our discussions with banks indicate that the clinic would have a favorable Return On Investment (ROI). We also anticipate that wellness education and park area improvements in the proposed North Log Yard redevelopment will encourage healthy habits, and reduce risk of heart disease and diabetes. In the Southwestern Technology Park, we expect Foreign Trade Zone status and extensive industrial infrastructure to bring economic growth, taking advantage of population increase and economic expansion in the North Central Washington and Southern British Columbia trade region.

The Inchelium Wood Treatment Plant and Nespelem Post & Pole redevelopments would provide light industrial space on blighted property, while conserving adjacent lands. The community of Inchelium is remote, and it is our hope that attention to redevelopment in central Inchelium, combined with our efforts to encourage telecommuting, will increase sustainability and resilience of this small community.

In the Grandview Trailer Court site, our blight removal project will reduce fire hazards and increase safety. Our most idealistic, yet possibly least expensive and easiest to implement redevelopment opportunity is at the Hinman Ranch, where an expanded walking path, stream restoration, and planting of traditional food sources would provide opportunities to revitalize and strengthen our Tribal traditions.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

At the Omak Mill, multiple resources for reuse and redevelopment (described below) will be accessed following use of an assessment grant. Due diligence under the assessment grant will facilitate conversion of the site to Tribal Trust Land status, opening access to U.S. Bureau of Indian Affairs (BIA) Roads Program funding. Assessment will also be needed prior to bank financing for the proposed Health Clinic. The assessment grant would be used to develop site-specific cleanup levels on the area proposed for a Head Start grant-funded facility, and to verify where development of the child-oriented facility could be done safely, despite the industrial history. Tribally-run businesses in the Technology Park area would build upon the success with our other tribal business enterprises, which employ over 800 people.

At the Inchelium Wood Treatment Plant and Nespelem Post & Pole, funding for redevelopment will be from the biennial budget approved by the Tribal Business Council, based on Planning Department recommendations in our Capital Facilities Improvement Plan. The Planning Department will use assessment information to be confident in recommending these investments. At the Grandview Trailer court site between Washington Highway 155 and the Columbia River, mixed use development after assessment and blight removal would be privately financed in concert with its designation for federal Opportunity Zone tax incentives on investment. For recreational projects at Hinman Ranch, grant applications will be submitted to the Washington State Recreation and Conservation Office (RCO). We are the only Tribe utilizing RCO funding,

and over the past two years we have conducted three projects bringing in nearly \$400,000 in total State recreation funding.

ii. Use of Existing Infrastructure

The Omak Mill, formerly the largest manufacturing facility in the region, has impressive infrastructure that will be reused. Infrastructure includes an existing fiber optic vault, 20 Megawatt electrical substation, water supply system with 20-inch supply line, rail service with a direct connection to an Intermodal Rail Yard, and close proximity to the City of Omak wastewater system.

The Inchelium Wood Treatment Plant is ideally located to utilize existing infrastructure. Development of an equipment storage building over backfilled excavations at the former industrial site would change underutilized property into a community asset near HUD Housing and the community's Health Clinic.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

Our Reservation is highly rural, with a total population of 7,686, and population density under 4 people per square mile. Our residents are often very low income, with median household income under \$39,000 and high poverty rate (27.8%) double that of the State (12.2%) and Nation (14.6%). Available jobs on the Reservation are largely in government or low-wage retail and food services sectors. We struggle to meet basic transportation and health care needs, and lack resources to carry out assessment and cleanup planning on brownfields. We do not levy taxes, and instead rely on initiatives such as timber sales, federal and state grants, and tribally-owned small businesses to obtain revenue. We struggle to find funds to address tribal members living in poverty who often need multiple types of assistance, and we do not have funds to properly assess contamination on our complex priority brownfield sites.

ii. Threats to Sensitive Populations

1. Health or Welfare of Sensitive Populations: Many of our tribal members struggle in extreme rural poverty. Children on our Reservation face food insecurity and elevated levels of violence that – in the absence of social and economic improvements – can perpetuate across generations. Nearly 80% of the surveyed population on the Reservation were subject to a failed Boarding School system that has far-reaching impacts seen today. The system was disbanded in the 1970's, and was an unfortunate attempt to destroy indigenous heritage and practices by separating children from their families using intensive reprogramming including physical abuse (2016 Spotlight on Poverty and Opportunity).

According to the Northwest Tribal Epidemiology Center, American Indian children in Washington are more than twice as likely to live in poverty compared to Non-Hispanic Whites, and poverty often leads to crowded conditions in dilapidated housing. A 2013 report from the National American Indian Housing Council found nearly 1/3 of Reservation housing is overcrowded. Our children living in overcrowded homes suffer from sleep deprivation and inability to concentrate in school. Our children also suffer from poor access to health care, with no after-hours clinics, and only one dentist on our Reservation.

Overcrowded housing and poor health care access lead to educational challenges. Our Tribal Members have low educational attainment, with 42% of adults having a high school diploma or less. Lack of education leads to lack of job opportunity (particularly with loss of blue collar jobs such as the Omak Mill), high unemployment, prevalent poverty, and perpetuation of our child welfare problems.

Desperation from this cycle often leads to elevated drug/alcohol use and suicide. The rate of meth use among American Indians is the highest of any ethnicity in the country and more than twice as high as any other group, according to the National Congress of American Indians (NCAI). On our Reservation, the youth suicide rate, at 36.4 per 100,000, is almost triple the national suicide rate (13.5 per).

Through brownfields assessment and redevelopment, we seek to combat this cycle of desperation. By developing the vacant Omak Mill into child care and medical facilities we can bring improved health care to

our members. By improving housing conditions on the Grandview Trailer Court, we can stem the negative impacts to children currently living in overcrowded and poor quality housing.

2. Greater Than Normal Incidence of Disease and Adverse Health Conditions: We suffer from elevated mortality rates and other health challenges that have in some cases been linked to exposure to contaminants. Overall, the Community Health Profile (CHP) report for Washington found that the mortality rate for American Indians was 1.7 times higher than the rate for Non-Hispanic Whites. Rates of mortality among American Indians were four times higher for liver disease (target organ for contaminants) and nearly three times higher for diabetes compared to Non-Hispanic Whites. These health problems may be associated with exposure to contaminants. According to ATSDR, liver damage can be caused by benzene (a petroleum constituent) and by phenol (discharged at the Omak Mill). According to the Journal of Diabetes Investigation (March 2015), diabetes can be aggravated by exposure to arsenic, which is a contaminant at the Inchelium Wood Treatment Plant and at Nespelem Post & Pole.

The assessment grant will identify and reduce exposure and reduce potential health threats from our priority sites. At the Omak Mill, we will assess surface soil contamination and delineate the extent of phenol discharged to the floodplain. At the Grandview Trailer Court, we will survey the asbestos in buildings prior to demolition, preventing release and potential exposure. Our additional efforts to test building materials will also focus on substandard housing in order to reduce blight and threats (such as mold), which will improve respiratory health.

3. Economically Impoverished/Disproportionately Impacted Populations: Our Reservation suffers from extreme economic poverty and disproportionate impacts of the decline in the wood products industry. Our overall poverty rate (27.8%) has been well above 20% for multiple decennial census readings. In the shadow of former wood treatment facilities, poverty rates are also high, including 27.6% in Omak and 44.3% in the small community of Inchelium. In East Omak, we will identify and delineate health threats from the shuttered Omak Mill, and develop new health facilities. We will also assess and redevelop contaminated wood products facilities in the towns of Nespelem and Inchelium.

b. Community Engagement

i. Community Involvement

We will involve the community partners listed in the table below in decisions about where assessments should be focused, what land use our cleanup planning should be directed toward, and what the best redevelopment potential is for our priority sites on the edge of the Reservation in Omak and Elmer City.

Partner Name	Point of Contact	Role in the Project
Key Bank	Ryan Bumrungkittikul	Procure private financing for Health
	ryan_bumrungkittikul@keybank.com	Clinic on the Omak Mill site
	425-709-4575	
Omak Chamber of	Maria Lassila,	Identify potential investment partners to
Commerce	(b) (6)	redevelop the infrastructure-rich
		Technology Park area of the former
		Omak Mill
Coulee Dam	Kerry Higgins,	Identify potential developer interested
Chamber of	chamber@grandcouleedam.org,	in Opportunity Zone tax incentives on
Commerce	509-633-3074	the Grandview Trailer Court site
Okanogan River	Kathy Moses,	Field community concerns about
Airshed	Kathy.Moses@colvilletribes.com,	potential contaminant exposure during
Partnership	509-634-2413	reuse of brownfields sites

At the rural brownfield sites (Nespelem Post & Pole, Hinman Ranch, and Inchelium Wood Treatment Plant), we will partner with the Planning Department to address redevelopment issues. For example, at Nespelem Post & Pole, the Planning Department has indicated that centralization of recycling operations is a goal that would be furthered by redeveloping the site. At the Inchelium Wood Treatment Plant, inquiry from the representatives on the Tribal Business Council about the status of the site and availability for reuse caused our Environmental Trust Department to select it as a priority. At Hinman Ranch, members of our 3P Resource Review Team are invested in seeing the recommendations of their 2012 plan implemented during redevelopment of this site. Beyond these specific partners, we will involve the general public in each of our target areas by participating in meetings in each relevant Tribal Business Council District (Omak, Nespelem, and Inchelium) and the Elmer City Council (includes Grandview Trailer Court priority site).

ii. Incorporating Community Input

Our target areas include towns such as Inchelium and Nespelem that are 83% and 91% American Indian, respectively. Within our Indian community, we have created committees, councils, and partnerships to seek input and help make decisions relevant to our brownfields program. Our Communications Specialist, Kathy Moses, leads efforts to obtain and respond to community input.

Opportunities to solicit community input during the grant period include annual presentations to the Tribal Business Council, discussion of site-specific testing proposals and cleanup approaches at the applicable District meetings (Omak, Nespelem, and Inchelium have priority brownfield sites) or the Elmer City Council (Grandview Trailer Court priority site), and annual open public meetings (e.g., during the Omak Stampede held in the East Omak neighborhood near the blighted Omak Mill). We will advertise public meetings in the Tribal Tribune newspaper, on our website, and on our Facebook page.

Successful previous examples of community input that has impacted environmental activities include the Okanogan River Airshed Partnership led by Ms. Moses, which started when the Omak Mill was active. This community engagement led to suggestions for a yard waste collection program to reduce open burning. We also had a successful East Omak Redevelopment Vision meeting on February 23, 2018 that was held in the local community near the mill. Our Planning Department received 54 community suggestions for redevelopment, including the health clinic and the wellness center concepts subsequently adopted. We anticipate a high level of input by the community, and responsiveness within our Brownfields Program, matching what we saw with the East Omak redevelopment outreach.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks and Activities

Paragraphs below describe the tasks that will be completed by each key entity on the project. Proposed schedule and milestones are at the end of this section.

<u>Task 1: Program Management</u> (CTCR responsibility) – Activities will include selection of a Qualified Environmental Professional (QEP), completing eligibility questionnaires and quarterly reports, entering information into ACRES, and coordinating with EPA. We will also meet with our Planning Department to discuss proposed assessment activities and selection of additional sites from our inventory.

<u>Task 2: Community Outreach</u> (CTCR responsibility, with materials prepared by QEP) – Activities will include preparing educational fact sheets and presentation materials (done by QEP), presenting status of grant funded work to the Tribal Business Council annually, presenting draft SAPs and cleanup plans in-person to the applicable District Meeting or Elmer City Council, updating the CTCR web page to discuss Brownfields, sending quarterly email updates, and holding at least three open public meetings including one during the Omak Stampede in summer 2020.

<u>Task 3: Site Assessment</u> (QEP responsibility) – Activities will include producing a Programmatic Quality Assurance Project Plan (QAPP), completing three Phase I assessments (2 hazardous substance, 1 petroleum) and 7 Phase II assessments (4 hazardous substance priority sites, 2 additional building materials sites, 1

additional petroleum site). Phase II assessment of the Omak Mill facility will be the largest effort, with testing performed in accordance with the 2015 Remedial Action Work Plan for the areas that are redevelopable in the short term (West Boneyard, North Log Yard, phenolic resin discharge area to Omak Creek Floodplain, Plywood Plant building).

Assessment of the Hinman Ranch will be the second-largest effort. On-site scope of work includes all activities recommended in a September 2012 Phase II Recommendations letter, except cleaning tanks, consolidating, profiling, and disposing of unused chemicals (i.e. cleanup activities that are not eligible). Two priority sites, Nespelem Post & Pole site and the Grandview Trailer Court, will undergo multi-building Phase II inspection for asbestos and other contaminants. Each Phase II assessment listed above will include a Sampling & Analysis Plan (SAP), Health and Safety Plan (HASP), and Report of Findings.

After Phase II assessments on our priority sites, we will conduct 2 additional hazardous substance building materials inspections of blighted buildings (\$19,350 each). We will also conduct one 1 petroleum Phase II at a tank site (assumed cost of \$36,900 to include boreholes and groundwater wells).

Task 4: Cleanup Planning (QEP responsibility) — Three cleanup planning documents will be produced (2 hazardous substance, 1 petroleum). The hazardous substance documents will include a conceptual groundwater remediation plan for the Inchelium Wood Treatment Plant, and a cleanup plan for multiple media at the Hinman Ranch. We will also complete an Analysis of Brownfields Cleanup Alternatives (ABCA) for a petroleum site.

In-kind Reuse Planning (CTCR responsibility) – As an in-kind contribution of approximately \$36,810 to brownfields redevelopment during the 3 year grant period, our Planning Department will perform planning, permitting, and construction bidding for our priority sites (see detail in Section 3b).

Proposed schedule and milestones for assessment grant activities include finalizing an EPA-approved Work Plan in October 2019. By the end of 2019, we will procure QEP services, get eligibility for our priority sites, and complete a QAPP. In Q1 2020, we will produce a cleanup plan for the Inchelium Wood Treatment Plant priority site, write draft SAPs for the other 4 priority sites (Omak Mill, Grandview Village Trailer Court, Nespelem Post & Pole, and Hinman Ranch), and hold public meetings to review each draft SAP. In Q2 2020, we will implement Phase II assessment on our priority sites.

After the priority site work described above is complete, we will have more than two years to produce three Phase Is, three additional Phase IIs (2 on building materials sites, 1 on a petroleum site), and two cleanup planning documents (Hinman Ranch cleanup plan, ABCA for 1 petroleum site). We believe the proposed schedule is achievable and realistic.

b. Cost Estimates and Outputs

The table on Page 8 shows the grant budget by task. Approx. 87% of the grant funding is proposed for Phase I and II assessments. Rationale for each budget category is presented below by Task, and specifies the percentage (%) of overall grant budget, itemizes Personnel Costs and Contractual Costs, and identifies the Outputs with an asterisk (*).

Task 1: Program Management (4%). Personnel Costs: 271.8 hours at \$30.81 per hour = \$8,373 for one QEP contract*, 10 site eligibility questionnaires*, 12 quarterly reports*, one final Status Report*, and access on at least 10 sites*. ACRES updates with each status report (10 new sites added to ACRES*, including the 5 priority sites, 2 additional building materials sites, and 3 additional petroleum sites [one each for Phase I, Phase II, and ABCA]). In addition to the deliverables above, Program Management will also include monthly strategy meetings with the QEP, quarterly progress meetings with EPA, and interface with our Planning Department. Travel Costs: \$2,500 for airfare, hotels, and food to attend national and regional conferences related to brownfields assessment and redevelopment.

<u>Task 2: Community Outreach</u> (4%). Personnel Costs: 152.5 hours at \$30.81 per hour = \$4,699 to conduct three annual Business Council presentations*, present 7 draft SAPs and 3 cleanup plans to the applicable

District Meeting or Elmer City Council*, update our website to discuss Brownfields*, send quarterly email updates*, and hold three additional open public meetings*. Contractual Costs: 4 fact sheets* at \$600 each = \$2,400, 2 in-person public meeting presentations* at \$1,200 each = \$2,400, remote presentation to 4 District Meetings* at approx. \$230 each = \$925.

	P	ROJECT BUDGET						
	Project Tasks							
Budget Categories	1: General Programmatic	2: Community Outreach	3: Site Assessment	4: Cleanup Planning	Total			
Personnel								
Hazardous Substance	\$3,400	\$2,000	\$0	\$0	\$5,400			
Petroleum	\$3,193	\$1,700	\$0	\$0	\$4,893			
Fringe Benefits ¹								
Hazardous Substance	\$918	\$540	\$0	\$0	\$1,458			
Petroleum	\$862	\$459	\$0	\$0	\$1,321			
Travel ²								
Hazardous Substance	\$1,500	\$0	\$0	\$0	\$1,500			
Petroleum	\$1,000	\$0	\$0	\$0	\$1,000			
(No Equipment or Supplie	es will be purchas	ed with the asses	sment grant)					
Contractual								
Hazardous Substance	\$0	\$2,998	\$129,603	\$11,500	\$144,101			
Petroleum	\$0	\$2,728	\$130,343	\$3,500	\$136,571			
TOTAL								
Hazardous Substance	\$5,818	\$5,538	\$129,603	\$11,500	\$152,459			
Petroleum	\$5,055	\$4,887	\$130,343	\$3,500	\$143,785			
TOTAL DIRECT COST	\$10,873	\$10,425	\$259,946	\$15,000	\$296,244			
INDIRECT COSTS	\$2,406	\$1,350	\$0	\$0	\$3,756			
OVERALL TOTAL	\$13,279	\$11,775	\$259,946	\$15,000	\$300,000			
¹ Fringe calculated at 27%. ² Tra	avel for brownfield-re	lated conferences an	d community out	reach meetings.				

<u>Task 3: Site Assessment</u> (87%). Contractual Costs: one programmatic QAPP* (\$4,000), 3 Phase I assessments* at \$3,900 each = \$11,700, 7 Phase II Assessments* (6 hazardous substance, 1 petroleum; plus, petroleum eligibility and minor petroleum assessment components for Omak Mill and Hinman Ranch, which are majority hazardous substance). Each Phase II assessment includes SAP, HASP, and Report of Findings. To keep costs of building materials assessments low, we will produce a standardized Guide to summarize testing frequencies and techniques. As an additional cost saving approach, we will seek to determine the extent of contamination under one field mobilization, where possible.

In accordance with the above cost-saving approaches, the cost for the first building materials SAP is estimated at \$6,000 and the subsequent 3 building materials SAPs are estimated at \$2,900 each. Average costs for the 4 building materials Phase II are estimated at \$19,350 each. The proposed Phase II testing at the Omak Mill is extensive (\$90,282), and would address the West Boneyard, North Log Yard, Omak Creek Floodplain, and the Plywood Plant building. Proposed scope for each area is per the 2015 Remedial Action Work Plan, and includes test pitting to verify presence of USTs and if they leaked, test pitting to delineate the extent of tar impacts in the vicinity of tar ASTs, sampling for petroleum impacts near 3 large fuel ASTs, soil vapor sampling, and sampling beneath an oil-stained floor slab.

At the Hinman Ranch, scope of Phase II assessment includes testing in the Hay Barn Area, sampling of creek sediment, and groundwater monitoring in three areas (AST area, wood treatment area, and dip vat area) in

accordance with a September 2012 Phase II Recommendations letter. Total cost estimate is \$39,664, and includes 4 days on-site of field scientist, 3 days of excavator, and 2 days of driller, plus laboratory costs, monitoring equipment, food and lodging, vehicle, and shipment of samples.

<u>Task 4: Cleanup Planning</u> (5%). Contractual Costs: 3 cleanup planning documents*, including a groundwater remediation plan to remove remaining impacts at the Inchelium Wood Treatment Plant (\$5,500), cleanup plan for Hinman Ranch (\$6,000), and an ABCA for a petroleum site (\$3,500).

Reuse Planning (\$36,810 total). CTCR Planning Department will complete an East Omak Master Plan (\$12,420), coordinate the construction bidding processes for the Grandview Trailer Court (\$12,420), conduct permitting for the proposed Omak Health Clinic and the Inchelium storage building (\$4,140), create a reuse plan for Hinman Ranch (\$6,840), and manage the Request for Proposals for construction on the Nespelem Post & Pole site (\$990).

c. Measuring Environmental Results

CTCR Tribal Response Program Manager, Amelia Stanger, will track Outputs from the assessment grant, measure the pace of activities (such as sites addressed per year), and evaluate if additional outreach is needed to meet all goals in the grant period. At least twice per year, Ms. Stanger will have a strategy meeting with the QEP and EPA to present her evaluation of progress, and set Output goals for the upcoming 6 months. Schedule milestones are as follows for the Outputs under each Task: For *Task 1: Project Management*, QEP contract and completed site eligibility for each priority site are anticipated in Q4 2019, status reports with ACRES updates will be submitted quarterly, and final project summary will be within 60 days of the end of the grant. For *Task 2: Community Outreach*, we will present annually to the Tribal Business Council, hold one open public meeting per year, send out quarterly email updates, and meet with stakeholders in the applicable Districts prior to approval of each SAP or cleanup plan. For *Task 3: Site Assessment*, we will conduct one Phase I assessment per year, complete assessment on the applicable priority sites (Omak Mill, Hinman Ranch, Nespelem Post & Pole, and Grandview Trailer Court) by end of Q3 2020, and will have 2 remaining years to complete 3 additional Phase II assessments. For *Task 4: Cleanup Planning*, we will produce one cleanup planning document per year.

If we set goals twice-per-year and coordinate closely with the EPA Brownfields Program and our QEP, we will achieve the following Outcomes: Our Tribal Business Council will recognize brownfields funding as an excellent resource to address underutilized property and blight. We will stay compliant with EPA work plan commitments, and our priority sites will each be redeveloped. Our first Outcome will be removal of structures from the blighted Grandview Trailer Court, followed by attracting a housing developer interested in Opportunity Zone tax incentives. At the Inchelium Wood Treatment Plant, the District will be able to build a storage building on blighted property. At Nespelem Post & Pole, we will either repurpose or demolish the out-of-use buildings. At Omak Mill, assessment will clear the North Log Yard for development of the proposed Health Clinic and for construction of playfields and creek restoration. We anticipate a technology park will utilize existing infrastructure on the Omak Mill. At Hinman Ranch, we will expand recreational use of trails, including along a restored stream, and will begin growing and gathering traditional food plants, providing opportunity for Tribal youth to bring our traditions to life and connect to their culture.

c. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. <u>Organizational Structure</u> - We will manage the Assessment grant in our Environmental Trust Department (ETD), which is directed by Amelia Marchand. She will provide oversight of budgets, contracts, and agreements; and will coordinate with upper management in the CTCR as well as the Tribal Business Council.

Technical aspects of the Assessment grant will be the responsibility of the TRP Manager, Amelia Stanger. She will lead community outreach, interface with our QEP and EPA Project Officer, track Outputs, attend Brownfields trainings, and prepare quarterly reports. She has a background in interdisciplinary natural

resource management, emergency response, and climate change analysis; and extensive experience in cultural resource investigations, as well as rapport with Tribal and BIA programs.

Kathy Moses will be our Communications Specialist providing connection between our programs and the public. She has been with ETD since 2004, and has led communications efforts during multiple natural resource emergencies, including fires.

Shelly Clark, Administrative Assistant, has been with ETD since 2011. She maintains the Information Repository, assists in preparing quarterly reports, manages TRP reporting to ACRES, and assists Ms. Moses with public meetings. ETD Associate Accountant, Shonita Ratcliff, has been with the department for seven years, oversees financial reporting and draw requests, and assists Ms. Clark in processing contractor invoices.

ii. Acquiring Additional Resources - The CTCR will comply with the Cost Principles in 2 CFR 200, Subpart E and with 2 CFR 200 as it relates to Procurement. Where applicable, qualified contractors will be procured using federal Office of Management and Budget (OMB) standards and the CTCR Purchasing Policies and Guidelines (Tribal Resolution 2016-554). We will build from extensive procurement experience with our 128(a) annual awards, and on emergency response. For example, when a vehicular accident on May 19, 2015 released a substantial volume of hazardous substances to land and water of our Reservation, we worked with EPA to approve federal funds up to a cumulative total of \$200,000 to ensure ETD had access to environmental and hydrogeological consulting services associated with initial response and interim cleanup actions driven by the release.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

We have received annual EPA 128(a) funding for our TRP for 14 years. Accomplishments and Compliance for our past three 128(a) awards are listed below.

- 1. Accomplishments: Using EPA 128(a) funding, we have performed environmental assessments on 25 sites on the Reservation and surroundings, and performed pre-demolition assessment for asbestos and lead-based paint on 21 derelict structures. This has resulted in safe demolition of all of the assessed derelict structures, and movement of 8 sites into a groundwater monitoring phase. Sites we have assessed include Underground Storage Tank (UST) and Aboveground Storage Tank (AST) facilities, pesticide impacts from an illicit marijuana growing operation, a former landfill now converted to a transfer station, groundwater monitoring at 5 other solid waste transfer stations, and soil impacts following emergency response from vandalization of a PCB-containing transformer and from a fuel truck accident adjacent to the San Poil River. We have also provided stakeholder input on assessment and remediation of the Orchard Chemical site and the Buckhorn Mountain Mine. Initiatives we have implemented using EPA funding include collection events for household hazardous waste and toxic electronics, inventory of our Abandoned Mine Lands, and creation of a Voluntary Cleanup Program.
- 2. Compliance with Grant Requirements: In the entire tenure of Shelly Clark as our administrative support (2011 and forward), we have had timely and complete updates to ACRES, Quarterly Reports on-time, and have complied with the terms and conditions of our annual 128(a) grant awards. In order to ensure effective communication and proper authorization, we have established an administrative review procedure with signing authorities, and meet with our EPA Project Officer via conference calls, in-person office meetings, and on-site tours. For all of our 128(a) awards in this period, we have accomplished all Work Plan goals on-time and in-budget.

ATTACHMENT A:

Threshold Criteria

ATTACHMENT A

Threshold Criteria

1. Applicant Eligibility:

As a federally-recognized Indian Tribe, the Confederated Tribes of the Colville Reservation (CTCR) are an eligible applicant for an EPA Brownfields Assessment grant.

2. Community Involvement:

Through our Communications Director, the Brownfields Program of the CTCR will engage local stakeholders and the community in the vicinity of each priority site, building from past efforts with the Okanogan River Airshed Partnership and on redevelopment visioning for the former Omak Mill. We intend to inform and involve the local community and other stakeholders during planning and implementation phases. Please see Section 2.b of our Narrative for proposed community engagement details. We will conduct the following Community Outreach activities:

- a. Prepare educational fact sheets and presentation materials,
- b. Present status of grant funded work to the Tribal Business Council annually,
- c. Present draft Sampling & Analysis Plans (SAPs) and cleanup plans in person to the applicable District Meeting or Elmer City Council,
- d. Update our Environmental Trust Department website to discuss Brownfields,
- e. Send quarterly email updates, and
- f. Hold at least three open public meetings.

3. Expenditure of Assessment Grant Funds:

Not Applicable. The CTCR do not have an active EPA Brownfields Assessment grant.

Areas Affected By Project:

Colville Indian Reservation, Okanogan and Ferry Counties, Washington. Cities/towns that constitute our Target Areas are Omak, Inchelium, Elmer City, and Nespelem

OMB Number: 4040-0004 Expiration Date: 12/31/2019

Application for Federal Assistance SF-424									
* 1. Type of Submission: Preapplication	ķ	* 2. Type		* If Re	evision, select approp	priate letter((s):		
Application		Continuation * Other (Specify):							
Changed/Corrected A	Application		vision						
* 3. Date Received:		4. Applic	cant Identifier:						
01/31/2019									
5a. Federal Entity Identifier:				5b	o. Federal Award Ide	entifier:			
State Use Only:									
6. Date Received by State:			7. State Application	ldent	tifier:				
8. APPLICANT INFORMA	TION:								
* a. Legal Name: Confed	lerated Tri	bes of	f the Colville	Res	ervation				
* b. Employer/Taxpayer Ider	ntification Numb	oer (EIN	/TIN):	* (c. Organizational DU	JNS:			
91-0557683				1:	121675100000				
d. Address:				<u> </u>					
* Street1: PO B	ox 150]
Street2:									
* City: Nesp	elem								
County/Parish:									
* State:					WA: Washing	ton			
Province:									
* Country:	USA: UNITED STATES								
* Zip / Postal Code: 99155-0150									
e. Organizational Unit:									
Department Name:				Di	ivision Name:				
Environmental Trust				N	atural Resourc	ces			
f. Name and contact info	rmation of per	son to	be contacted on ma	atter	s involving this ap	oplication	:		
Prefix: Mrs.			* First Name):	Amelia				
Middle Name:									
* Last Name: Marchand	i								
Suffix:									
Title: Environmental Trust Director									
Organizational Affiliation:									
* Telephone Number: 509-634-2426 Fax Number: 509-634-2422									
*Email: amelia.marchand@colvilletribes.com									

Application for Federal Assistance SF-424						
* 9. Type of Applicant 1: Select Applicant Type:						
I: Indian/Native American Tribal Government (Federally Recognized)						
Type of Applicant 2: Select Applicant Type:						
Type of Applicant 3: Select Applicant Type:						
* Other (specify):						
* 10. Name of Federal Agency:						
Environmental Protection Agency						
11. Catalog of Federal Domestic Assistance Number:						
66.818						
CFDA Title:						
Brownfields Assessment and Cleanup Cooperative Agreements						
* 12. Funding Opportunity Number:						
EPA-OLEM-OBLR-18-06						
* Title:						
FY19 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS						
13. Competition Identification Number:						
Title:						
14. Areas Affected by Project (Cities, Counties, States, etc.):						
1234-Brownfield Areas Affected.pdf Add Attachment Delete Attachment View Attachment						
* 15. Descriptive Title of Applicant's Project:						
Brownfields target areas are Omak, Inchelium, Elmer City, and Nespelem						
Attach supporting documents as specified in agency instructions.						
Add Attachments Delete Attachments View Attachments						

Application for Federal Assistance SF-424						
16. Congressional I	Districts Of:					
* a. Applicant	A-005			* b. Program/P	Project WA-005	
Attach an additional li	st of Program/Project C	ongressional Distric	ts if needed.			
			Add Attachment	Delete Attach	nment View Attachment	
17. Proposed Proje	ct:					
* a. Start Date: 10/	01/2019			* b. Enc	d Date: 09/30/2020	
18. Estimated Fund	ing (\$):					
* a. Federal		300,000.00				
* b. Applicant		0.00				
* c. State		0.00				
* d. Local		0.00				
* e. Other		0.00				
* f. Program Income		0.00				
* g. TOTAL		300,000.00				
* 19. Is Application	Subject to Review By	/ State Under Exec	cutive Order 12372	Process?		
a. This applicati	on was made availab	le to the State unde	er the Executive Ord	er 12372 Process f	for review on	
b. Program is su	ubject to E.O. 12372 b	out has not been se	elected by the State	for review.		
C. Program is no	ot covered by E.O. 12	372.				
* 20. Is the Applicar	nt Delinquent On Any	Federal Debt? (If	"Yes," provide exp	lanation in attachm	nent.)	
Yes	No					
If "Yes", provide exp	planation and attach					
			Add Attachment	Delete Attach	nment View Attachment	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.						
Authorized Representative:						
Prefix: Mr.		* Firs	t Name: Francis			
Middle Name:						
* Last Name: Somo	lay					
Suffix:						
*Title: Executive Director						
* Telephone Number: 509-634-2238 Fax Number: 509-634-2276						
* Email: francis.somday@colvilletribes.com						
* Signature of Authori	zed Representative:	Shonita Ratcliff		* Date Signed:	01/31/2019	